Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's Rules	)	**WT Docket No. 05-235**
To Implement WRC-03 Regulations Applicable to	)	
Requirements for Operator Licenses in the	)	
Amateur Radio Service	)	
	)	

To the Commission:

Comments of Nickolaus E. Leggett, N3NL
Amateur Radio Operator

In this Notice of Proposed Rulemaking, the Commission proposes that knowledge of the Morse code be dropped as a requirement for an amateur radio operator license. In my comments, I am proposing simple and inexpensive steps that would preserve the special value of the Morse code for amateur radio and yet follow the strong trend to remove Morse code as a licensing requirement.

Morse Code Benefits for Amateur Radio

Morse code provides several important benefits to the modern amateur radio service. These benefits include the following:

1. Simple low-power communication systems that can communicate around the World on the high frequency (HF) amateur radio bands.
2. Inexpensive equipment that can be owned by amateur radio operators of modest means in the United States and abroad
3. A communications mode that functions well between people who speak different languages (using the Q signals).
4. A communications mode that is easily supported by home-made and kit-built radio equipment. This feature is very useful for new amateur radio operators learning electronics technology.

5. Morse code transmitters and receivers are easy to repair in the field.
6. In an extreme emergency, amateurs can provide Morse code communications using improvised equipment.
7. Educators, such as Mr. J. Fairclough of the Radio Club of Junior High School 22 in New York, have pointed out that Morse code is a significant motivational factor in using amateur radio in an educational environment. (Note 1)

Alternatives to a Morse Code Licensing Requirement

It is clear from the Commission's NPRM and the comments of the amateur radio community that the Morse code requirement for amateur radio licensing is going to be dropped. This follows the trend established by other nations throughout the World. (However, some nations such as Russia and Japan are keeping Morse code licensing requirements.)

Yet, at the same time, it would be highly desirable to encourage the benefits of Morse code for the amateur radio service. These comments discuss alternatives to include Morse code in the amateur radio regulatory structure.

Existing Morse Code Sub bands

The Commission should keep the existing Morse code sub bands or establish the regulation-by-bandwidth proposal that the ARRL is currently preparing. In the ARRL proposal, sub bands are proposed for narrow-band digital modes including Morse code.

New Morse Code Sub bands

The Commission will probably allocate some new spectrum to the amateur radio service in the future. Some of this spectrum may be in the low frequency range of 137 kHz, 190 kHz, and/or 500 kHz. When this spectrum is assigned, the Commission should establish sub bands in it for Morse code operation. These sub bands can be shared with other narrow-band digital modes.

Optional Morse Code Testing

The Commission should allow volunteer examiners the option of replacing a subset of the Extra Class written questions with a Morse code exam. This option would be provided at the request of the applicant.

Respectfully submitted,

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Note 1: personal communication with J. Fairclough